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12 [Additional counsel on signature page]

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FREE RANGE CONTENT, INC., a
California corporation, COCONUT ISLAND
SOFTWARE, INC., a Hawaii corporation,
TAYLOR CHOSE, a Minnesota resident, and
MATTHEW SIMPSON, a British Columbia,
Canada resident, on behalf of themselves and
all others similarly situated,

Plaintiffs,
v.
GOOGLE LLC,
Defendant.

Case No. 5:14-cv-02329-BLF

**JOINT STIPULATED REQUEST AND
~~PROPOSED~~ ORDER TO CONTINUE
DEADLINES FOR PRELIMINARY APPROVAL
OF SETTLEMENT
AS MODIFIED BY THE COURT**

Courtroom: 3
Judge: Hon. Beth Labson Freeman
Trial Date: Vacated

1 This stipulation is entered into by and between Free Range Content, Inc., Coconut Island
 2 Software, Inc., Taylor Chose, and Matthew Simpson (“Plaintiffs”) and Google LLC (“Google”)
 3 (collectively, “the Parties”), by and through their respective counsel:

4 WHEREAS, this Court issued an order (“Order”) requesting a status update regarding the
 5 Parties’ progress toward reaching settlement on December 18, 2017 (Dkt. No. 235);

6 WHEREAS, in response to this Court’s Order, the Parties filed a Joint Response to
 7 Request for Status Update and Agreed Request and [Proposed] Order re: Motion for Preliminary
 8 Approval on January 8, 2018 (Dkt. No. 238), laying out the following proposed preliminary
 9 approval schedule:

Event	Date
Motion for Preliminary Approval	February 15, 2018
Response, if any	March 5, 2018
Reply, if any	March 12, 2018
Hearing, if any	March 22, 2018 at 9:00 a.m. (or as otherwise set by the Court)

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 15 WHEREAS, this Court issued an order accepting the above proposed preliminary
 16 approval schedule, with the exception of the hearing date, which the Court set for April 5, 2018
 17 (Dkt. No. 239);

18 WHEREAS, the Court has previously granted requests for scheduling extensions and
 19 modifications as detailed in ¶ 8 of the accompanying Declaration of Jeffrey M. Gutkin (“Gutkin
 20 Decl.”), and the Parties have neither stipulated to nor moved for any additional modifications of
 21 time (Gutkin Decl. ¶ 8);

22 WHEREAS, Civil Local Rule 6-2(a) permits parties to file a stipulation requesting an
 23 order changing time that affects the date of an event or deadline set by Court order;

24 WHEREAS, on the April 5, 2018 date for which this Court set the hearing on Plaintiffs’
 25 Motion for Preliminary Approval, Google’s lead counsel Michael Rhodes is scheduled to be in
 26 trial before the Honorable Edward J. Davila (trial currently set to conclude on May 8) and Jeffrey
 27 Gutkin is scheduled to be outside of the continental United States (Gutkin Decl. ¶ 3);

28 WHEREAS, Plaintiffs’ counsel informed Google’s counsel that they have scheduling

1 conflicts that would preclude them from attending a hearing on Plaintiffs' Motion for Preliminary
 2 Approval on the following Thursday, April 12, 2018 (Gutkin Decl. ¶ 4);

3 WHEREAS, in order to ensure that one of Google's lead counsel and Plaintiffs' counsel
 4 will be able to attend the hearing on Plaintiffs' Motion for Preliminary Approval, the Parties have
 5 conferred and agreed to request a brief continuance, until April 19, 2018, or whatever date
 6 thereafter is convenient for the Court (Gutkin Decl. ¶ 5);

7 WHEREAS, in light of the requested brief continuance of the hearing date, Plaintiffs have
 8 also determined they would be aided by an additional week to prepare their Motion for
 9 Preliminary Approval, and Google has no objection to Plaintiffs' request for additional time
 10 (Gutkin Decl. ¶ 6);

11 NOW THEREFORE, pursuant to Civil Local Rule 6-2(a), Google and Plaintiffs jointly
 12 make the stipulated request that the Court enter an order modifying the schedule for preliminary
 13 approval as follows:

Event	Date
Motion for Preliminary Approval	February 22, 2018
Response, if any	March 12, 2018
Reply, if any	March 19, 2018
Hearing, if any	April 19, 2018 at 9:00 a.m. (or whatever date thereafter is convenient for the Court)

19 **IT IS SO STIPULATED.**

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1 Dated: January 22, 2018

COOLEY LLP
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JEFFREY M. GUTKIN (216083)
KYLE C. WONG (224021)

4 /s/ Jeffrey M. Gutkin
5 Jeffrey M. Gutkin
6 Attorneys for Defendant
7 GOOGLE LLC

8 Dated: January 22, 2018

9 HAGENS BERMAN SOBOL SHAPIRO LLP
10 STEVE W. BERMAN (*pro hac vice*)
11 ROBERT F. LOPEZ (*pro hac vice*)

12 /s/ Robert F. Lopez
13 Robert F. Lopez
14 Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated: January 25, 2018


16 THE HONORABLE BETH LABSON FREEMAN
17 UNITED STATES DISTRICT JUDGE

18 The Court hereby RESETS the hearing on the motion for preliminary approval to
19 April 27, 2018 at 9:00 A.M.